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Filing date: **02/13/2009**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91185677
Party	Plaintiff Trek Bicycle Corporation
Correspondence Address	Mary Catherine Merz Merz & Associates, P.C. 1140 Lake Street, Suite #304 Oak Park, IL 60301-1051 UNITED STATES docket@merz-law.com
Submission	Stipulated/Consent Motion to Extend
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Date	02/13/2009
Attachments	22620-consentmotionextend3.pdf (3 pages)(12663 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of U.S. Application Serial No. 77/277,445
For: BONAGE and Design
Filed: September 12, 2007
Date of Publication: July 29, 2008

TREK BICYCLE CORPORATION)	
)	
Opposer,)	
)	
v.)	Opposition No. 91185677
)	
BONAGE INC., S.A.)	
)	
Applicant.)	

**CONSENTED MOTION TO EXTEND DEADLINE FOR
INITIAL DISCLOSURES UNDER FEDERAL RULE 26(A)(1)**

Pursuant to an extension granted by the Board, the parties' initial disclosures currently are due by February 13, 2008. The parties are still engaged in discussions toward a resolution which would preclude the need to conduct discovery in this matter. Accordingly, counsel for opposer, Bruce Haraguchi, and counsel for applicant, H. Jay Spiegel, have stipulated that the deadline for initial disclosures and other discovery and testimony dates be extended for an additional 30 days, pending the ongoing settlement discussions.

This consented motion seeks the Board's approval of a further 30-day extension to the deadline for initial disclosures

and to the discovery and testimony periods from their current deadlines, to the following:

Initial Disclosures Due	3/15/2009
Expert Disclosures Due	7/13/2009
Discovery Closes	8/12/2009
Plaintiff's Pretrial Disclosures	9/26/2009
Plaintiff's 30-day Trial Period Ends	11/10/2009
Defendant's Pretrial Disclosures	11/25/2009
Defendant's 30-day Trial Period Ends	1/09/2010
Plaintiff's Rebuttal Disclosures	1/24/2010
Plaintiff's 15-day Rebuttal Pd Ends	2/23/2010

Respectfully submitted,

TREK BICYCLE CORPORATION

Date: February 13, 2009



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing CONSENTED MOTION TO EXTEND DEADLINE FOR INITIAL DISCLOSURES UNDER FEDERAL RULE 26(A)(1) was served on applicant's attorney by e-mail pursuant to mutual agreement of the parties, this 13th day of February 2009, addressed to:

H. Jay Spiegel
Jayspiegel@aol.com

Attorney for Applicant

By: /Bruce Haraguchi/
Bruce Haraguchi